


# 2014 Annual Contractor workshop

## What Every Professional Needs to Know About Lead

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Two types of certified companies that can conduct paint disturbing work in target housing and child occupied facilities.

U.S. Environmental Protection Agency's (EPA) Renovate,  
Repair and Painting Rule (RRP).  
Renovation

Lead Abatement



There are three types of regulated work that disturb lead-based paint.

Renovation  
(EPA)

Interim Control  
(HUD, EPA)

Lead Abatement  
(State of Michigan, HUD, EPA)





# Renovation

RRP covers all paint disturbing work in target housing and child occupied facilities except for lead abatement.



# Lead Abatement

Lead abatement regulations apply any time the intent of the work is to address lead-based paint or lead-based paint hazards and a lead abatement method is used in target housing and child occupied facilities.

Lead abatement requirements apply to the work area from the time that set up starts until the time the clearance passes.



# Lead Abatement

Lead abatement methods include removal, enclosure or encapsulation.

All paint disturbing activities must follow lead abatement work practice standards.



# Training/Certification

## Renovation

EPA Certified Renovation  
Firm.

EPA Certified Renovator.

## Abatement

Michigan Certified  
Abatement Firm.

Certified lead abatement  
supervisor.





# Training/Certification

## Renovation

All personnel must be certified renovators or be trained by the certified renovator for the days activities.

## Abatement

All personnel on site must be certified abatement workers of supervisors.



# Training/Certification

## Renovation

The certified renovator must be on site for all setup and cleanup activities and be available during the work.

## Abatement

The certified abatement supervisor must be on site during all work activities.



# Renovation and Abatement Work Practices

Conduct pre-renovation education.

Ensure that the occupants leave the work area and do not return until cleaning verification or clearance is complete.



# Renovation and Abatement Work Practices

Set up caution tape or a barrier system to define the perimeter of the exterior work area.

Deploy warning/caution signs on all sides at the perimeter of exterior work areas and at all entrances to interior work areas.



# Renovation and Abatement Work Practices

Remove occupant belongings from the work area or cover and seal them with plastic sheeting.

Deploy exterior plastic sheeting extending out 10 feet in all directions from the surfaces being worked on or farther if needed to catch all dust and debris created by the work.



# Renovation and Abatement Work Practices

## Renovation

Deployed interior plastic sheeting out 6 feet in all directions or more if needed and tape it down.

## Abatement

Deployed interior plastic sheeting from wall to wall or wall to containment and tape it down.



# Renovation and Abatement Work Practices

Turn off the HVAC system and seal off HVAC registers within the work area.

Deploy measures to prevent tracking dust and debris off of the plastic sheeting and out of the work area using booties, tack pads and/or plastic runners.



# Renovation and Abatement Clean Up

Debris and plastic sheeting must be removed and cleaned up so that dust and debris are not released during clean up.

Wrap all debris in 6mil plastic sheeting or bags and seal with tape.

Clean up using a HEPA Vacuum and wet methods.





# Renovation and Abatement Clean Up

## Renovation

Conduct cleaning  
verification and pass it.

## Abatement

Call for a clearance and  
pass it.



# Renovation and Abatement Paperwork

## Renovation

Prepare the required RRP  
report.

Provide to owner and adult  
occupant, or a  
representative of the child-  
occupied facility, if different.

Keep all records for 3 years.

## Abatement

Prepare the required  
abatement report.

Provide report to the owner.

Provide report to the person  
who paid for the abatement.

Keep all records for 3 years.





CAUTION  
Lead Based  
Work Area



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SEP 27 2005









03/22/2011



# When is work not lead abatement?

When the house or building was built after 1977.



# When is work not lead abatement?

When the work does not disturb painted surfaces.





## When is work not lead abatement?

When the intent of the work is to improve the property and lead-based paint or lead-based paint hazards are not required to be addressed.



## When is work not lead abatement?

When lead-based paint or lead-based paint hazards are identified and an interim control method is used to address the lead-based paint or lead-based paint hazard.



## When is work lead abatement?

A project where the intent of the work is to address lead-based paint and/or lead-based paint hazards and an abatement method is used.



# When is work lead abatement?

A project where the contract documents call for lead abatement.



## When is work lead abatement?

When a regulation requires addressing lead-based paint or lead based-paint hazards and an abatement method is used.



## When is work lead abatement?

When a person wants the work to address lead-based paint or the work to be conducted as lead abatement. That person could be the owner, a spec writer or the contractor.



## When is work lead abatement?

When an abatement order is given by a state or local government agency and an abatement method is used.



# Interim Control

Interim Controls, by state definition, is a set of measures designed to temporarily reduce human exposure to lead-based paint hazards.

Interim control activities include painting, landscaping, specialized cleaning, repairs, maintenance, temporary containments, etc.





## Interim Control

The work practices are the same as lead abatement.

Interim control activities can be conducted on either an abatement site or a renovation site.



## Interim Control

When conducted on a lead abatement site the work must be conducted under abatement protocols.



# Interim Control

HUD has additional requirements that must be followed when interim controls are conducted as a renovation project.



# Interim Control

All workers must have taken a HUD approved 8 hour training class.



## Interim Control

The high dust/low dust standard in the Chapter 8 of the HUD Guidelines applies the same as it does to abatement.



# Interim Control

A clearance is required instead of cleaning verification.



## Interim Control

HUD does not allow the use of lead check swabs. HUD only allows for testing to be conducted as a LBP inspection and risk assessment.



# Interim Control

HUD's de minimis levels are more restrictive.





## In A Nut Shell

All lead-based paint work will essentially look the same.

All projects will have certified workers and companies.

Sites will all have caution tape, warning/caution signs and require the use of plastic sheeting and protection of occupants and their belongings.



# A Year in Review



# Five Types of Investigations

Training Providers  
Lead Assessors  
Pre-Renovation Education  
EBL Child in a Rental Unit  
Abatement





205

























HURON

CAUTION  
DO NOT ENTER  
NO TRESPASSING  
NO PARKING









8140

ADT

CAUTION  
LESS HAZARD  
WORK AREA











































SILVER  
Adhesive  
No. 100  
No. 100  
No. 100















